

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	19-cr-10063-DJC
RANDALL CRATER,)	
)	
Defendant)	

ASSENTED-TO MOTION TO CONTINUE DEFENDANT'S SENTENCING DATE

Defendant Randall Crater, by and through undersigned counsel, hereby moves this Honorable Court to continue his sentencing date, currently scheduled for December 1, 2022, to January 25, 2023, or any date thereafter that is convenient for the Court.

In support of this motion, defendant states, by and through undersigned counsel, that undersigned counsel has retained the services of Dr. Susan Knight, a forensic psychologist, to evaluate defendant to aid the Court at his sentencing. To date, Dr. Knight has met with defendant. However, due to Dr. Knight's other professional commitments, she was unable to schedule a meeting with defendant's mother and sister in person until December 2, 2022. After meeting with defendant's mother and sister, Dr. Knight intends to meet with defendant one more time to conduct additional testing. Thereafter, Dr. Knight will need some additional time to provide the Court with her written report. Given the Court's prior authorization of Dr. Knight's evaluation, defendant submits that it is in the interests of justice for Dr.

Knight to complete her evaluation for the Court's consideration prior to defendant's sentencing.

Undersigned counsel has discussed this continuance with U.S. Probation Officer Richard Rinaldi. Should the Court grant this continuance, Mr. Rinaldi requested that counsel be advised that all objections to the initial presentence report will be due no later than January 4, 2023, and that the final presentence report will be provided to the parties on January 18, 2023.

Finally, undersigned counsel has conferred with counsel for the government, Assistant U.S. Attorney Christopher J. Markham, regarding this request and the government assents to this motion.

WHEREFORE, defendant respectfully requests that this Honorable Court continue his sentencing to January 25, 2023, or any date thereafter that is convenient for the Court.

Respectfully submitted,
For the Defendant,
Randall Crater
By his attorneys:

/s/ Scott P. Lopez
Scott P. Lopez, BBO # 549556
splopez@lawson-weitzen.com
LAWSON & WEITZEN, LLP
88 Black Falcon Ave, Suite 345
Boston, MA 02210
617-439-4990 (tel.)
617-439-3987 (fax)

Dated: November 15, 2022

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

The undersigned counsel for Randall Crater hereby certifies that he conferred with AUSA Christopher J. Markham on November 15, 2022, by telephone, in a good faith attempt to resolve or narrow the issue raised in this motion and the government assents to this motion.

/s/ Scott P. Lopez
Scott P. Lopez

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 15, 2022.

/s/ Scott P. Lopez
Scott P. Lopez